July 07, 2021 CLERK, U.S. DISTRICT COURT WESTERN DISTRICT OF TEXAS

COURT BY: MG

EXAS

DEPUTY

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

SA-21-CR-00292-OLG

UNITED STATES OF AMERICA,	§	
	§	
Plaintiff,	§	<u>INDICTMENT</u>
	§	Ct 1: 8 U.S.C. \S 1324(a)(1)(A)(v)(I)/
	§	(B)(i)
	§	Conspiracy to Transport Illegal Aliens
	§	Ct 2: 8 U.S.C. § 1324(a)(1)(A)(ii)/
VS.	§	(B)(i)
	§	Transportation of Illegal Aliens
	§	
	§	
JORDAN WILLIAM ARNOLD,	§	
	§	
Defendant.	§	

THE GRAND JURY CHARGES:

COUNT ONE [8 U.S.C. § 1324(a)(1)(A)(v)(I)/(B)(i)]

On or about June 11, 2021, in the Western District of Texas, Defendants,

JORDAN WILLIAM ARNOLD

did knowingly and intentionally combine, conspire, confederate and agree with others, known and unknown to the Grand Jury, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact that said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I)/(B)(i).

COUNT TWO

[8 U.S.C. \S 1324(a)(1)(A)(ii)/(B)(i)]

On or about June 11, 2021, in the Western District of Texas, Defendants,

JORDAN WILLIAM ARNOLD

did, knowingly and in reckless disregard of the fact that certain aliens have come to, entered and remained in the United States in violation of law, willfully and unlawfully transport and move, and attempted to transport and move, by means of transportation or otherwise, in furtherance of such violation of law, certain aliens within the United States, for the purpose of financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii)/(B)(i).

A TRUE BILL

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF UNITED STATES ATTORNEY

BY:

FOR AMANDA C. BROWN Assistant United States Attorney